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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MYRAH MARTINEZ, et al.,

Plaintiffs,

vs.

COUNTY OF SONOMA, et al.,

Defendants.

Case No. 3:15-cv-01953-JST

**ORDER ADOPTING STIPULATION OF
DISMISSAL AND INJUNCTIVE RELIEF**

The parties hereby stipulate to the dismissal of Plaintiffs MYRAH MARTINEZ, KITARA MCCRAY, MADISON MARLENE MARVEL, and R.M.'s claims, with prejudice, and to the dismissal of the class claims, without prejudice, with each side to bear their own attorneys' fees and costs, and with the Court to retain continuing jurisdiction over the terms of the following stipulated injunction.

STIPULATED INJUNCTION

The County of Sonoma, through its Human Services Department, affirms that the Valley of the Moon Children's Home ("VOMCH") has had the following policies in place and shall continue to follow

these policies:

- a) VOMCH does not conduct personal or property searches unless there is individualized reasonable suspicion and a supervisor approves of the search, and it shall continue to follow this policy; and
- b) VOMCH does not take away clients' cell phones or chargers unless there is individualized reasonable cause for such and a supervisor approves, and it shall continue to follow this policy.

These are the only two stipulations required for this Injunction, and are the only two stipulations subject to the Court's continuing jurisdiction. County reserves the right to seek modification of these stipulations by the court in the future if needed.

Dated: September 26, 2016

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin

By: _____
Mark E. Merin

Attorneys for Plaintiffs
MYRAH MARTINEZ, KITARA MCCRAY,
MADISON MARLENE MARVEL, and R.M.

Dated: September 26, 2016

Respectfully Submitted,
SENNEFF FREEMAN & BLUESTONE, LLP

/s/ Bonnie A. Freeman
(as authorized on September 26, 2016)

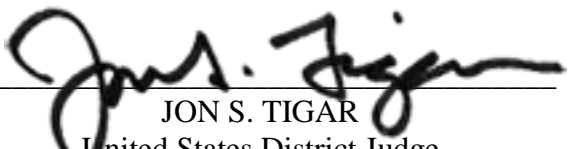
By: _____
Bonnie A. Freeman

Attorneys for Defendants County of Sonoma (also sued as Sonoma County Human Services Department and Sonoma County Family, Youth and Children's Services), Jerry Dunn, Nick Honey and Stacie Kabour

[PROPOSED] ORDER

IT IS SO ORDERED.

Dated: September 27, 2016



JON S. TIGAR
United States District Judge